

Western District of Oklahoma

PATRICK ROTH,

Plaintiff,

V.

JOHN RICKETTS (BADGE #1126) and OKLAHOMA CITY, a political subdivision of the State of Oklahoma,

Defendants

Civil Action No. CIV-19-903-G

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Google, Inc.
c/o Custodian of Records
1600 Amphitheatre Parkway
Mountain View, CA 94043

Production: **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Any videos posted and/or uploaded by the channel “Betsy Peeler” (accessible at https://www.youtube.com/channel/UC_xwm3Uusz1HyulB4DTgDFg) on September 18-19, 2019 including all versions of any video that was posted and have subsequently deleted and/or edited, including any prior versions of the video posted by the channel “Betsy Peeler” and available at <https://www.youtube.com/watch?v=pLQo7SO0V9Q>

Any videos posted and/or uploaded by the channel “News Now Patrick” (accessible at https://www.youtube.com/channel/UCXHRpJDPLXM8vrqUI_3PySQ) on September 18-19, 2019 including all versions of any video that was posted and have subsequently deleted and/or edited, including any prior versions of the video posted by the channel “News Now Patrick” and previously available at <https://youtu.be/e3PbB9C9-pg>

Place: Collins, Zorn & Wagner 429 N.E. 50 th Street, 2 nd Floor Oklahoma City, OK 73105	Date and Time: March 26, 2020 at 5:00 p.m.
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☐ *Inspection of Premises:* **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: March 12, 2019

CLERK OF COURT

Signature of Clerk or Deputy Clerk

OR

s/Ambre C. Gooch

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing Defendants, who issues or requests this subpoena, is:

Ambre C. Gooch, OBA No. 16586, COLLINS, ZORN & WAGNER, P.C.
429 NE 50TH Street, 2nd Floor, Oklahoma City, OK 73105
(405) 524-2070, Fax: (405) 524-2078, acg@czwlaw.com

Notice to the person who issues or requests this subpoena

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2020, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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Attorneys for Defendant Oklahoma City

s/ Ambre C. Gooch
Ambre C. Gooch

s/ Ambre C. Gooch
Ambre C. Gooch